



Patricia Kakalec
Patricia@KakalecLaw.com

March 11, 2024

MEMO ENDORSED

By ECF

Hon. Dale E. Ho
U.S. District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Kumar v. Abdulmohsen Alhunaif et al.*, 23-CV-321 (DEH)

Dear Judge Ho:

Our firm, along with Radford Scott, LLP, represents the Plaintiff in the above-referenced matter.

By Order dated February 15, 2024, the Court ordered that Plaintiff file any motion for default judgment by March 18, 2024. (ECF #35.) Plaintiff writes to request that this deadline be extended by two weeks, until April 1, 2024. We make this request because Plaintiff is preparing a detailed declaration in support of her motion, which requires Hindi interpretation during meetings with counsel and translation of the document itself. This has substantially prolonged the drafting process. In addition, Plaintiff's counsel have competing briefing and pretrial submission deadlines in multiple other matters.

No previous requests for an extension of this deadline have been made.

Thank you for your consideration of our application.

Application GRANTED.

Plaintiff shall file any motion for default judgment by **April 1, 2024**.

The Clerk of Court is respectfully requested to close ECF No. 38.

SO ORDERED.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patricia Kakalec".

Counsel for Plaintiffs

cc: D. Werner

A handwritten signature in black ink, appearing to read "Dale E. Ho".

Dale E. Ho
United States District Judge
Dated: March 12, 2024
New York, New York

Kakalec Law PLLC
80 Broad Street, Suite 703, New York NY 10004
(212) 705-8730; (646) 759-1587 (fax)
www.KakalecLaw.com